

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
V.)	Crim. No. 15-cr-10271-WGY
ALEX LEVIN)	

DEFENDANT'S ASSENTED-TO MOTION FOR PERMISSION TO TRAVEL

The defendant, Alex Levin, moves that this Court permit him to travel to Philadelphia, Pennsylvania from March 8, 2019 to March 10, 2019. Mr. Levin's pretrial conditions of release restrict his ability to travel beyond Massachusetts, New Hampshire, Rhode Island, Connecticut, and New York without Court permission. The United States, through Assistant U.S. Attorney Anne Paruti, assents to this motion. Jessica Turkington, Mr. Levin's assigned probation officer, has also indicated that she has no objection to this motion.

On July 6, 2018, the Court granted a motion to modify Mr. Levin's conditions of release and allow him to travel to the states bordering Massachusetts. Additionally, the Court removed a previously imposed curfew in order to allow Mr. Levin greater flexibility with this work schedule. Mr. Levin is still required to notify and seek approval from Probation and Pretrial Services in advance of any travel plans. Mr. Levin's probation officer, Ms. Turkington, informed him that the Court would have to approve any travel to the state of Pennsylvania.

Mr. Levin seeks to travel to Pennsylvania in order to attend his daughter

Elizabeth's Bat Mitzvah. Mr. Levin expects to play a significant role in the celebration. He will lead prayers and participate in the ceremony. Mr. Levin and Elizabeth have a close relationship, and he very much wants to be present for this significant moment in her life.

Mr. Levin has abided by the Court's conditions of release at all times. He has an unblemished record of compliance while on release. Mr. Levin has steadfastly adhered to the travel conditions imposed upon him, and has conferred with his probation officer on each occasion that he has sought permission to leave Massachusetts. Mr. Levin's adherence to the Court's orders during his release indicates that allowing him to travel to Pennsylvania for a brief period is warranted.

WHEREFORE, the defendant moves that this Court allow this motion and allow him to travel to Philadelphia, Pennsylvania from March 8, 2019 to March 10, 2019.

ALEX LEVIN
By his attorneys,
CARNEY & ASSOCIATES

J. W. Carney, Jr.

J. W. Carney, Jr.
B.B.O. # 074760

Daniel J. Gaudet

Daniel J. Gaudet
B.B.O. # 688120

20 Park Plaza, Suite 1405
Boston, MA 02116
617-933-0350
JCarney@CARNEYdefense.com

February 27, 2019

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
UNITED STATES OF AMERICA)	
)	
V.)	Crim. No. 15-cr-10271-WGY
)	
ALEX LEVIN)	
_____)	

AFFIDAVIT IN SUPPORT OF DEFENDANT'S MOTION
FOR PERMISSION TO TRAVEL

I, Daniel J. Gaudet, state that the facts contained in the attached motion are true to the best of my information and belief.

Signed under the penalties of perjury.

Daniel J. Gaudet
Daniel J. Gaudet

February 27, 2019

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on or before the above date.

Daniel J. Gaudet

Daniel J. Gaudet